

Intercontinental Terminals Company (ITC) Fire Morning Update Deer Park, Texas April 2, 2019 0000 – April 2, 2019 1159

Incident Management Objectives:

Objective 1: Ensure the health and safety of the public and response personnel.

Objective 2: Establish an incident management structure and processes employing the Incident Command System to enable effective overall management of the event with deployment of resources (staff and equipment) in a rapid, focused and well-coordinated manner.

Objective 3: Encourage a collaborative federalism approach, where Federal, State, Tribal, and local governments interact cooperatively and collectively to solve common problems.

Objective 4: Take actions to assess the on-site and off-site impacts during the emergency response phase of this incident. Provide this information to state and local authorities to assist them in their decision to protect the local citizens.

Objective 5: Conduct activities to prevent off-site releases from the ITC Tank Farm.

Objective 6: Respond to, mitigate and recovery off-site releases from the ITC Tank Farm.

Objective 7: Maintain open communication with Regional management

Incident Overview:

On March 17, 2019, an above ground storage tank containing Naphtha, caught fire at the Intercontinental Terminal Company (ITC), LLC facility in Deer Park Texas. The ITC facility consists of 15 80,000-barrel capacity above ground storage tanks containing petroleum products including Naphtha, Xylene, Toluene, Gasoline Blendstock, and Base Oil. Eleven of the 15 80,000-barrel capacity above ground storage tanks on site were involved in the fire, resulting in the release of contaminants into the atmosphere, as well discharging the contents of the tanks to drainage pathways. Firefighting water and foam potentially containing petroleum products were released from an outfall due to accumulation of water from firefighting efforts. Various firefighting organizations assisted in putting out the fire utilizing a variety of firefighting foams.

A partial breach of the tank farm containment wall on the northeast side near Tank 80-7 occurred at approximately 12:00 pm on March 22, 2019, to the ditched area and into Tucker Bayou. Additional boom was placed along the ditch leading to Tucker Bayou and Buffalo Bayou (Houston Ship Channel). The Responsible Party's contractor has rebuilt the containment wall using clay material.

At approximately 3:40 pm on March 22, 2019, three tanks reignited. The fire spread from the containment area through the breached containment wall into the ditch along Tidal Road. Foam was applied to the tanks and the ditch to extinguish the fire.

During and after the fire and the breach of the secondary containment, several readings of benzene above 1.0 ppm were detected (highest was 16.5 near National Tank Services) by the various entities

conducting air monitoring through the afternoon and night. These readings were located along the ship channel.

The United States Coast Guard (USCG) Captain of the Port is continuing the controlled open for the Ship Channel on March 26, 2019, with traffic during the daytime only. Decontamination vessels are being positioned to help ships that may have residue on the hulls.

Due to the initial fires and subsequent releases, shelters in place have occurred throughout the week of March 17, 2019.

Executive Overview:

- As of April 2, 2019, the number and amount of benzene detections has continued to decrease throughout the past two days, due to the continue removal of product from tanks and the tank farm, as well as continued use of foam as needed.
- The flushing plan for Tucker Bayou developed by EPA, TCEQ, USCG, and ITC was approved by Unified Command on April 2, 2019. Flushing operations will begin on April 3, 2019.
- On April 2, 2019, a conference call was conducted with TCEQ, EPA, ITC, and NOAA regarding the
 uncompleted environmental plans. An improved system will be established for document distribution
 and control, including nomenclature, document date, version number, developer, and distribution list.
- TCEQ and EPA provided comments on the Waste Water Treatment Plant (WWTP) and the Waste Handling and Interim Storage Plan to ITC representatives on April 2, 2019.
- On April 2, 2019, EPA, ITC, and TCEQ discussed how the upcoming rain forecast may affect waste handling and accumulation. The WWTP statement, developed by TCEQ and agreed upon by EPA, was provided to ITC.
- Several entities including TCEQ, EPA, and ITC continue to conduct air monitoring around the tank farm, in adjoining industrial areas, and communities downwind from the facility.
- EPA conducted surface water sampling on April 2, 2019, at 10 sample locations. The surface water samples were collected along Buffalo Bayou and the San Jacinto River, and will be analyzed for Perand polyfluoroalkyl substances (PFAS), Volatile Organic Compounds (VOCs), Semi-volatile Organic Compounds (SVOCs), Chemical Oxygen Demand (COD), and Oil & Grease.
- The Airborne Spectral Photometric Environmental Collection Technology (ASPECT) aircraft found no exceedances of the Texas comparison values on April 2, 2019 during Flight 18. ASPECT has conducted a screening level assessment to evaluate the unreported or undetected releases of hazardous materials or contaminants at the ITC in Deer Park, Texas. The screening level results from ASPECT were compared to the ASPECT list of TCEQ short-term Air Monitoring Comparison Values (AMCVs) and found no exceedances of the short-term AMCVs. No chemicals were detected by the ASPECT.
- EPA conducted air sampling using the Trace Atmospheric Gas Analyzer (TAGA) on April 2, 2019.
 The TAGA analyzed the air samples for benzene, toluene and xylene. The TAGA air sampling results were compared to the TCEQ short-term AMCVs and found no exceedances of the short-term AMCVs. These results have been shared with unified command and local officials.
- EPA conducted handheld air monitoring on April 2, 2019, (from midnight to 11:59 pm) at 49 locations.
 Results were reported above the detection limit at one location for total VOCs. EPA will conduct additional air monitoring and deploy the TAGA to determine if VOCs continue to be detected.
- TCEQ continued handheld air monitoring on April 2, 2019, (from 12:00 am to 10:00 pm);
 approximately 152 readings were taken. No readings above the Unified Command action level were detected.
- ITC continued air monitoring on April 2, 2019, (from midnight to midnight); there were 4,266 VOC readings (770 detections) with and 2,955 benzene readings (619 detections).
- Vacuum truck operations at Tucker Bayou and the outfall ditch continue 24-hour basis. There are currently 26 vacuum trucks on site.
- As of 7:00 pm on Tuesday, April 2, 2019, ITC deployed 128,500 feet of boom 72,703 barrels (bbl) of
 product/water was recovered from water operations 97,239 bbl of product/water was recovered from
 the tank farm, 128 cubic yards of contaminated solids were recovered, approximately 468,000 gallons
 of foam concentrate were used for fire-fighting/suppression and emission suppression, and 1,938
 people are working on-scene.

Total Vessels as of April 2, 2019					
Work Boats	Barges	Small Capacity Skimming Vessels	Skimmers	Total Vessels	
111	102	25	72	310	

Tank Status	Tank No.
Complete	80-2, 80-3, 80-7, 80-10, 80-12, 80-13, 80-14, 80-15
Standby	80-1, 80-4, 80-5, 80-6, 80-8, 80-9, 80-11

Coordination with State Agencies:

On March 17, 2019, in response to a tank fire at the ITC, federal, state and local agencies joined ITC in a Unified Command. Multiple agencies including the United States Coast Guard, the TCEQ, and Harris County Pollution Control Services supported the response effort.

EPA Resources:

Personnel	EPA R6 Dallas	ITC Deer Park	Total
EPA Region 6	11	8	19
EPA Non-Region 6	0	3	3
START	1	14	15
Other Contractors	0	8	8
Total	12	33	45

Additional Information: Air Monitoring and Water Sampling locations, and Wast Storage Tanks:



